

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 5:14-cr-00244
)	
DONALD L. BLANKENSHIP)	
)	

**DONALD L. BLANKENSHIP'S MOTION TO THE DISTRICT JUDGE
FOR PERMISSION TO TRAVEL HOME FOR CHRISTMAS AND NEW YEAR'S**

Donald L. Blankenship, through counsel, hereby respectfully moves this Court for an order permitting him to travel home to Nevada, from December 19, 2015 through January 5, 2016, to spend the Christmas and New Year's holidays with his fiancée and members of their families. In light of the pending holiday and the need to secure travel arrangements, Mr. Blankenship respectfully requests that this motion be considered on an expeditious basis. This request is made pursuant to Mr. Blankenship's conditions of release, which permit travel outside the Southern District of West Virginia "as pre-approved by the Court." Order Setting Conditions of Release ¶ 7(f) (ECF. No. 15). It has now been more than a year since Mr. Blankenship has been granted permission to travel to the home he shares with his fiancée.

Mr. Blankenship has never been a flight risk. For the reasons set forth in Mr. Blankenship's Motion to Amend the Conditions of His Release Pending Sentence, submitted this same day, he certainly is not now. He has a perfect record of appearance in this case, has remained in full compliance with the terms and conditions of his release on bond for more than a year, and was acquitted last week on all felony charges he was facing.

For the foregoing reasons, and those set forth in Mr. Blankenship's Motion to Amend the Conditions of His Release Pending Sentence, Mr. Blankenship respectfully requests that the

Court issue an order permitting him to travel home to Nevada from December 19, 2015 through January 5, 2016. As when Mr. Blankenship was granted permission to travel home last November, should the Court grant this request, the Probation Office will be fully apprised of Mr. Blankenship's travel arrangements in advance of the trip, including the particular dates of travel and the manner of transportation.

Dated: December 8, 2015

Respectfully submitted,

/s/ William W. Taylor, III

William W. Taylor, III
Blair G. Brown
Eric R. Delinsky
R. Miles Clark
Steven N. Herman
ZUCKERMAN SPAEDER LLP
1800 M Street, NW, Suite 1000
Washington, DC 20036
202-778-1800 (phone) / 202-822-8106 (fax)
wtaylor@zuckerman.com
bbrown@zuckerman.com
edelinsky@zuckerman.com
mclark@zuckerman.com
sherman@zuckerman.com

/s/ James A. Walls

James A. Walls (WVSB #5175)
SPILMAN THOMAS & BATTLE, PLLC
48 Donley Street, Suite 800
Morgantown, WV 26501
304-291-7947 (phone) / 304-291-7979 (fax)
jwalls@spilmanlaw.com

/s/ Alexander Macia

Alexander Macia
SPILMAN THOMAS & BATTLE, PLLC
P.O. Box 273
Charleston, WV 25321-0273
304-340-3800 (phone) / 304-340-3801 (fax)
amacia@spilmanlaw.com

Counsel for Donald L. Blankenship

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been electronically filed and service has been made by virtue of such electronic filing this 8th day of December, 2015 on:

R. Booth Goodwin, II
Steven R. Ruby
Gabriele Wohl
U.S. Attorney's Office
P.O. Box 1713
Charleston, WV 25326-1713

R. Gregory McVey
U.S. Attorney's Office
845 Fifth Avenue, Room 209
Huntington, WV 25701

/s/ R. Miles Clark
R. Miles Clark